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July 16, 1986

REPLY TO: Woodland Hills

The Honorable Paul G. Breckenridge, Jr.  
SUPERIOR COURT OF CALIFORNIA  
111 North Hill Street, Dept. 57  
Los Angeles, California 90012

Re: Gerald Armstrong vs. Church of Scientology  
of California; LASC Case No. C420153(severed action)

Dear Judge Breckenridge:

On June 26, 1986, the Court ordered that the three boxes of Mr. Armstrong's Pre-Clear Folders were to be made available for inspection and/or copying at a place convenient to the County Clerk, commencing at 9:00 A.M. on July 15, 1986.

In an attempt to comply with the Order, I spoke to Cynthia Collins, a representative of the County Clerk's Office on July 15, 1986. Ms. Collins advised me that copies of the Pre-Clear Folders could only be made by representatives of the County Clerk at \$.57/page. Ms. Collins further advised me that the Court had confirmed the same in a telephone conversation and that a Minute Order would be issued.

Although I had made arrangements for an outside copying service to copy the Pre-Clear Folders at a time and place convenient to the Court Clerk, Ms. Collins advised me that this procedure was not possible since the outside copying machine would be using County electricity. I have made attempts to find a service that does not utilize electricity, but have been unsuccessful.

My client, Mr. Armstrong, desires a full copy of the Pre-Clear Folders, thereby necessitating copies of the three boxes of materials. At \$.57/page this could cost Mr. Armstrong thousands of dollars which he does not have.

I am thus requesting, on behalf of Mr. Armstrong, that some other arrangements be made for the inspection and copying of the Pre-Clear Folders. If counsel for the Church of Scientology of California have no objections, I suggest any one of the

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following procedures be followed:

- (1) The three Beakins' boxes could be picked up by a representative of my office, in my presence and in the presence of a representative of the Church of Scientology of California, and delivered to an outside agency for copying. I and a representative of the Church of Scientology of California could observe the copying process and then return the three boxes to the Court for safekeeping; or
- (2) A representative of my office could pick up the three Beakins' boxes from the Court in the presence of a representative from the Church of Scientology of California and bring the boxes back to my office. There, in the presence of a representative of the Church of Scientology of California, the documents could be copied on our machine and then immediately returned to the Court for safekeeping.

Mr. Armstrong has been waiting a very long time to obtain copies of the Pre-Clear Folders. He thus requests that the Court provide a more equitable means for him to obtain the same.

Very truly yours,

CONTOS & BUNCH

JULIA DRAGOJEVIC

JD:pr

cc: Gerald Armstrong  
Donald C. Randolph, Esq.  
John G. Peterson, Esq.